

# EXHIBIT B

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**From:** Seikaly, Kate J  
**Sent:** Thursday, January 17, 2019 2:08 PM  
**To:** Kravis, Jonathan (USADC) (Jonathan.Kravis3@usdoj.gov)  
**Cc:** jsr@usdoj.gov; Ira@usdoj.gov; Alpino, Heather (NSD) (JMD); Rakoczy, Kathryn (USADC); Curtis, Deborah (USADC)  
**Subject:** Concord  
**Attachments:** April 11 Request for Bill of Particulars.PDF

Jonathan,

On April 11, 2018, we sent the attached letter requesting a bill of particulars. On May 17, 2018, Ms. Rhee stated that the government would not be providing any of the information requested. Nevertheless, we request a written response to our letter and specifically an explanation of your position as to whether or not we are entitled to the information requested.

To avoid any confusion, our request related to paragraph 2 of the Indictment for the names of all alleged conspirators known to the government is intended as a request for the identity of all unindicted co-conspirators. As you know, it is the practice of courts in this district to grant requests for this information. *See, e.g., U.S. v. Hubbard*, 474 F. Supp. 64, 81 (D.D.C. 1979); *U.S. v. Trie*, 21 F. Supp. 2d 7, 22 (D.D.C. 1998); *U.S. v. Ramirez*, 54 F. Supp. 2d 25, 30 (D.D.C. 1999); *U.S. v. Karake*, 281 F. Supp. 2d 302, 310 (2003); *U.S. v. Brodie*, 326 F. Supp. 2d 83, 91 (D.D.C. 2004).

Given that we sent our request more than eight months ago, we would appreciate a written response by 5 pm on Tuesday, January 22.

Thanks,  
Kate

**Kate Seikaly**  
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